

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

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Candy Argot

[Enter the full name of the plaintiff in this action]

Civil Action No. \_\_\_\_\_  
(to be assigned by Clerk)

**COMPLAINT**  
**State Prisoner**

v.

Dr. Oliver Marden

Dana Smith

Columbia Regional Care Center

Chief Bruce McCleave

Steve Adwell

Enter above the full name of defendant(s) in this action

**I. PREVIOUS LAWSUITS**

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes \_\_\_\_\_ No ☒

B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: \_\_\_\_\_

Defendant(s): \_\_\_\_\_

2. Court: \_\_\_\_\_  
(If federal court, name the district; if state court, name the county)

3. Docket Number: \_\_\_\_\_

4. Name(s) of Judge(s) to whom case was assigned: \_\_\_\_\_

5. Disposition: \_\_\_\_\_  
(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

## II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: Columbia Regional Care Center
- B. What are the issues that you are attempting to litigate in the above-captioned case? Medical Malpractice, Violation of my Constitutional Rights
- C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
- (2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☒ No ☐
- When See attached Grievance Number (if available) See attached
- D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☒ No ☐
- E. When was the final agency/departmental/institutional answer or determination received by you? See attached
- If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes N/A No ☐
- G. If your answer is YES:
1. What steps did you take? \_\_\_\_\_
  2. What was the result? \_\_\_\_\_

## III. PARTIES

*In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.*

- A. Name of Plaintiff: Candy Argot Inmate No.: 3697
- Address: 7901 Farrow Rd., Columbia, S.C. 29203

*In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.*

- B. Name of Defendant: Major Cummings Position: Over Security
- Place of Employment: Columbia Regional Care Center

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Captain Richardson, Officer Peterson, Ofc. Whitaker, Erica Brown - Nurse, Sgt. Glenn, Ofc. Whitman, Ofc. Crewell, Catherine - Nurse, Ofc. Rosin, Ms. Mills - Nurse, Rochelle - Nurse, Joy - Nurse, Tangea - Nurse, Leroy - Nurse, Lya Davis - Nurse

## IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

I am a patient/inmate at Columbia Regional Care Center. Columbia Regional Care Center is a prison hospital owned by Geo Care, Inc. I was sent here by the Georgia Department of Corrections in August of 2008 and I have been here ever since. Steve Adwell is the Administrator over this facility and he is in charge of its operations and policies. Bruce McCleave is in charge of security and patient moves.

My first complaint is that I am a medical patient, but I am being housed with violent psychiatric patients.

1) On 1-4-10, I was helping another patient on the phone when Lucretia Felder came up from behind me and punched me in the back of my head. When I turned around, she continued to punch me with her fists. She then pushed me on the floor and got on top of me and continued to punch me, along with bite me and scratch me. She had threatened me several times before this occurred and officers, along with Captain Cummings were all made aware of the problem. Yet, nothing was done about it. I even requested protective custody, but was denied it. I also was not the only one that was threatened by her, yet she was still able to be around anyone she wanted and was able to threaten whoever she wanted. I had requested to press charges against her, but I was told by Captain Richardson that I could not, because Lucretia was severe mental health and was not liable for her actions.

2) On 12-30-10, at approx. 6:10 p.m. Emerald Miller and

## IV. STATEMENT OF CLAIM - continued.

Brandi Thompson came in my room and attacked me while I was sitting on my bed. When I stood up, Brandi pushed me on my back onto my bed. Emerald and Brandi both repeatedly punched me in my right eye and scratched me. Right before they both came in my room and attacked me, they went into another patient's room and assaulted her. Therefore, they both should have been locked in their rooms from this previous attack, but they were not. Ofcs. Peterson and Whitaker, along with the nurse Erica Brown were working on this night and heard both patients repeatedly walk pass me and threaten me. However, no one said, or did anything to either patient. Even after the Sgt. and Ofcs. walked in my room while I was being assaulted, both Emerald and Brandi continued to assault me.

3) I spoke directly to Mr. Adwell on 6-22-11 and told him that I was a medical patient, housed with severe mental health patients that have irate behavior and endanger my life. I then requested to be moved back to the medical floor (Unit 7). He declined to move me however and stated that I would be fine and that they would keep an eye on me.

My second complaint is that I have been given medication by force against my will and without a court order.

1) On 4-3-10, the RNS (Ms. Mills) was working on the 4th floor. She came in my room and left the blood sugar machine, along with some lancets and insulin. She then told me and my roommate to check our blood sugars and for me to take my scheduled dose of insulin (which we are not supposed

to do any of, without a nurses supervision). My blood sugar read that it was over 600, so I took the remaining 10u that was left in the insulin pen. Ms. Mills came back with an insulin syringe and told me that she wanted me to take 15u more of Regular insulin, even though it wasn't scheduled and she had no doctors' order to do so. I told her that there was no doctors' order to give the insulin to me, so she could not do so. She said that it was written in the past, so she was just going to go ahead and give it to me. I told her that I did not want it, because there was no doctors' order and the Regular insulin made my blood sugar drop too low. She said, "whatever" and turned around and left and did not return.

2) On 4-8-10, at approx. 3:00 a.m. the nurse came in and said that the doctor wanted her to give me 15u of Regular insulin, on top of the Novolog insulin that I received shortly before that. I told her that I didn't want it, because the last time I took Regular insulin, it made my blood sugar drop too low. She left and shortly after came back with seven officers (one of which is Rosind

and had me held down and video taped. Along with being forced to take the regular insulin, even though I repeatedly said that I didn't want it. Then, at approx. 8:00 a.m. they could not wake me up, because my blood sugar had dropped too low and I was unconscious.

3) On 12-26-10, the nurse came in my room and woke me up to check my blood sugar. I had no idea what time it was, so I let her check it. She said that my blood sugar was high and left. She came back shortly afterwards to give me some insulin. She said she was going to give me 15u Novolog and I asked her why she wasn't giving me the scheduled dose of 18u, but she said that it wasn't time for the 18u, because I just ate lunch. I told her that I didn't want it and she told Drs. Whitman and Crewell to come in my room and hold me down. Then, even after the charge nurse (Catherine) came in they still didn't let me get up. I repeatedly said that I did not want it, because it would make my blood sugar drop too low. Which I have a legal right to refuse any medication. My third complaint is that I was not given proper medical treatment when my finger got infected.

1) For over three weeks' my finger was severely infected, which for the most part, got that way due to Dr. Harden and Nurse Practitioner Dana Smith cutting and lancing on it at this facility. When I was finally taken to the hospital, they operated on it. Then, when I was sent back here the following day, they ordered for the bandage to be changed three times a day, but this order was hardly ever followed. Later, when it was ordered for my finger to be soaked, that was not followed either. Therefore, my finger was not properly healed. Nor was pain medicine given to me as prescribed.

2) On 11-3-10, I asked for pain medication at 5:00 p.m., but I did not receive it until 6:30 p.m. Causing me to be in excruciating pain. Also, on that day I did not receive my first dressing change until 6:30 p.m., but my dressing changes were due at 9:00 a.m., 4:00 p.m. and 8:00 p.m. I also only got one other dressing change that day and that was at 11:05 p.m. I also requested pain medicine at 10:00 p.m., but I did not receive any until 11:05 p.m. However, my pain medicine was prescribed every 4 hours as needed.

On 11-4-10, my dressing change order was changed to twice a day instead of 3 times a day. However, I only received one dressing change that day, which was at 6:45 p.m. My dressing changes were scheduled to be at 6:00 a.m. and 6:00 p.m.

On 11-5-10, I requested pain medicine at 1:00 a.m., but was told that I received it at 10:00 p.m. the night before. However, I had not received any pain medicine since 6:00 p.m. the night before. I also received my one and only dressing change at 7:00 p.m. on this day.

On 11-6-10, my dressing change was only done one time at 10:00 a.m.

On 11-7-10, my dressing change was done only one time at 6:30 p.m.

The main nurses that were involved with my dressing changes and pain medication, were Rochelle (7 p.m. - 7 a.m.), Joy (7 p.m. - 7 a.m.), Tangela (7 a.m. - 7 p.m.), Leray (7 a.m. - 7 p.m.), Kya Davis (7 a.m. - 7 p.m.) and Catherine (7 a.m. - 7 p.m.).

There have been other dates and times of events of being forced medicated for me to take insulin that

they wanted me to take, but I currently do not remember the exact dates, or times.

There are also other people involved with all of the listed events, but I cannot recall their names at this present time.

All of the defendants listed in this complaint were employees of Geo Care inc. and Columbia Regional Care Center, at the time of the incidents that I have described. #

V. RELIEF

*State briefly and exactly what you want the court to do for you.*

I would like payment for my pain and suffering.  
I also want to be guaranteed that I will not have to  
live with psychiatric, or severe mental health patients, for  
the remainder of my stay up here.

**I declare under penalty of perjury that the foregoing is true and correct.**

Signed this 12<sup>th</sup> day of August, 2011

Pandy Drost

*Signature of Plaintiff*